

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RENALDO WHITE and RANDOLPH NADEAU,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

SYMETRA ASSIGNED BENEFITS SERVICE
COMPANY and SYMETRA LIFE INSURANCE
COMPANY,

Defendants.

CASE NO. 2:20-CV-01866-MJP

STIPULATED MOTION AND
PROPOSED ORDER EXTENDING
CLASS CERTIFICATION
DEADLINE

NOTE FOR HEARING:
October 14, 2021

The parties, by and through their counsel, hereby submit the following stipulated motion and respectfully request the Court's approval to adjust the schedule for completion of class certification discovery. The parties previously requested an extension on September 8, 2021, Dkt. 51, which was granted by this Court's September 9, 2021 Order, Dkt. 52. Plaintiffs' Motion for Class Certification is presently due on November 12, 2021.

Since that time, the parties have been working diligently to complete class certification discovery, most recently electronic discovery relating to Plaintiffs' discovery requests. Defendants produced 18,557 pages of electronic documents on October 8 and expect to produce additional electronic documents this week, and further expect another significant volume for the remaining

1 electronic documents, which are anticipated to be ready for production by November 2. Defendants
 2 expect to complete their production by November 5, 2021.

3 The requested extensions are supported by good cause. The extensions are necessary to
 4 permit the completion of Defendants' ESI productions, which may be relevant to class certification
 5 and, in turn, to provide Plaintiffs with an opportunity to review the same prior to seeking
 6 certification of the class. The requested extensions will not interfere with other deadlines in this
 7 case.
 8

9 Therefore, the parties agree and request that the Court extend the current class certification
 10 discovery deadline to November 5, 2021. The parties propose the following briefing schedule for
 11 Plaintiffs' Motion for Class Certification and respectfully request that the Court enter the same:

- 12 • December 10, 2021: Plaintiffs' Motion for Class Certification
- 13 • January 14, 2022: Defendants' Opposition
- 14 • February 4, 2022: Plaintiffs' Reply

15 Respectfully submitted this 14th day of October, 2021.

16 KELLER ROHRBACK L.L.P.

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Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED. The deadline for class action discovery is extended to November 5, 2021. The briefing schedule for Plaintiffs' Motion for Class Certification is as follows:

- December 10, 2021: Plaintiffs' Motion for Class Certification
- January 14, 2022: Defendants' Opposition
- February 4, 2022: Plaintiffs' Reply

Dated this 18th day of October, 2021.



Marsha J. Pechman
United States District Judge

CERTIFICATE OF SERVICE

I, Jan Likit, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 701 Fifth Ave., Suite 3300, Seattle, WA 98101. On this day, I caused a true and correct copy of the foregoing document to be filed with the Court electronically. I caused the same to be served on the parties listed below in the manner indicated.

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Via U.S. Mail
 Via Hand Delivery
 Via Electronic Mail
 Via Overnight Mail
 CM/ECF via court's website

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct, to the best of my knowledge.

Executed on this 12th day of March, 2021, at Seattle, Washington.

Jan Likit
 Litigation Legal Assistant
 4813-4640-4351, v. 1